

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0671

Comment submitted by Jodi L. Reese, PE, CET Engineering Services

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## Submitter Information

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## General Comment

Given the reality of the economic situation that exists for all in the Bay watershed and beyond, the implementation of the actions needed to restore the Chesapeake Bay will not occur unless there is sufficient funding by the federal and state governments. This was the conclusion of the Blue Ribbon Finance Panel created by the Chesapeake Executive Council in 2004. Will the recommendations of the Blue Ribbon Finance Panel be implemented and, if not, what effective funding and financing efforts will be made?

In an effort to identify the financial resources essential for cleaning up the nation's largest estuary, the Chesapeake Executive Council in December 2003 called for the creation of a Blue Ribbon Finance Panel to make recommendations for the effective funding and financing of the Bay clean-up effort. The Panel reached an early and strong consensus, however, that simply improving existing programs alone will not be sufficient. The Panel recognized that something more substantive and dramatic will be required. The Blue Ribbon Finance Panel proposed that the six Bay watershed states and the District of Columbia create a Chesapeake Bay Financing Authority, capitalized by the federal and state governments, with the capacity to make loans and grants. Their conclusion was that the Federal government should provide \$12 billion and the seven jurisdictions together should contribute \$3 billion. The Chesapeake Bay has been rightly called a National Treasure but the draft EPA TMDL is requiring the ratepayers of point source wastewater treatment facilities to unfairly bear the majority of the cost for restoration.